

## Worksheet

### Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)

U.S. Department of the Interior  
Bureau of Land Management (BLM)

(OR090 – DNA-04-03)

---

#### **A. Description of the Proposed Action**

The Proposed Action is to burn approximately 6 acres in the Long Tom Area of Critical Environmental Concern (ACEC), located in the Township 16s – Range 5w Section 33 NE ¼ of NW ¼ near Eugene Oregon. Prescribed burning involves the hand application of fire (via drip torches) to remove and control invasive woody plants, remove thatch, and invigorate native plant populations in wet prairie systems. Burns would be low-intensity and short duration, would occur after late August to allow for the majority of plants to set, release seed, and begin to senesce. All burns would comply with BLM and State of Oregon regulations and protocols to minimize the possibility of lost control of the burn. Fire control/suppression would be accomplished with the use of pre-burn hose lays and fire retardant foam, and wet-lining the burn perimeter prior to and during the burn. An area 10-20' wide would be mowed around the outside boundary of the burn area to help assure fire control. Fire vehicles would be restricted to adjacent non-native pasture vegetation. Human movement in the area would be managed to minimize impacts on the native prairie community.

#### **Background**

The Long Tom ACEC unit (action area) was established in 1984 by Eugene District of the Bureau of Land Management (BLM) to protect a native remnant wetland prairie. Three BLM Special Status plant species, all endemic to prairie habitats, occur at the Long Tom ACEC unit. These species include the federally – listed Endangered Bradshaw's lomatium (*Lomatium bradrawii*), the Bureau Sensitive species shaggy horkelia (*Horkelia congesta*) and the Bureau Assessment species timwort (*Cicendia quadrangularis*). Willamette Valley prairies evolved with fall-season fires. Presumably plants of these prairies are well-adapted and potentially dependent upon the presence of fire for their continued healthy existence. Presently, the Long Tom ACEC unit is being encroached by shrubs and trees. If succession of the prairie to woodland plant community is allowed to continue, native prairie plants would ultimately be extirpated. Continued use of prescribed fire would help control shrubs and tree as well as enhance the reproductive status of Bradshaw's lomatium (*Lomatium bradrawii*) (Pendergrass 1994; Kaye 1996). Monitoring of the rare plants is conducted annually and the data is analyzed to determine the effects of fire.

#### **B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans**

**LUP Name\*** Eugene District Record of Decision and Resource Management Plan (RMP)

June 1995      Date Approved

The Eugene District RMP calls for implementing prescribed fire where needed and where possible to maintain or enhance special status plants, species habitat (pg. 55). The RMP (pg. 57) directs BLM to implement management actions/directions of the proposed RMP that are designed to enhance and maintain habitat for all endangered species in all Land Use Allocations. At page 72, the RMP states noxious weed and other non native pest plants will be controlled to maintain or restore Special Area values; at page 74, the RMP indicates emphasis would first be placed on using non chemical and other natural processes, including fire and manual removal methods, to control exotic or competing vegetation.

**Other document** – West Eugene Wetland Plan 2004

**C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.**

List by name and date all applicable NEPA documents that cover the proposed action.

- EA -93-31 Long Tom ACEC prescribed Burn
- EA -95-27 Long Tom ACEC Prescribed Burn

List by name and date other documentation relevant to the proposed action (e.g., source drinking water assessments, biological assessment, biological opinion, watershed assessment, allotment evaluation, rangeland health standard's assessment and determinations, and monitoring the report).

- Biological Assessment (2004) – Treatments to Enhance Rare Plant Populations at West Greenhill & Long Tom Area of Critical Environmental Concern (ACEC) in the West Eugene Wetlands.
- Biological Assessment - Management Activities to Protect and Enhance Three Listed Species at Balboa, Oxbow West, Fir Butte, and Coble sites in the West Eugene Wetlands (2003).

**D. NEPA Adequacy Criteria**

**1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?**

Yes - The Proposed Action of prescribed fire on the Long Tom ACEC unit is the same action previously analyzed in two Environment Analyses (EA-93-31/EA-95-27). These EAs analyzed the effects of prescribed fire for the same project area. The proposed burn area is identical to those covered by the existing EAs.

**2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, resource values, and circumstances?**

Yes – the Environment Assessment analyzed an appropriate range of alternatives given the purpose and need for the project. Three alternative were analyzed, Alternative A (prescribed fire & other actions), Alternative B (no prescribed fire), and Alternative C (No Action).

**3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances.**

Yes – Studies indicate that prescribed fire has enhanced the reproductive status of *Lomatium bradshawii* (Pendergass 1994; Kaye 1996). Monitoring results of the *L. bradshawii* at the Long Tom indicate an increase in population immediately following burning (1997 & 1999). These findings are consistent with effects analysis of the previous environmental analysis. Resource conditions have not changed in anyway that would invalidate the analysis.

**4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?**

Yes – Ongoing research and annual monitoring in the ACEC support the use of prescribed fire, as an appropriate method for the enhancement & restoration of wetland prairie ecosystems similar to those in the proposed burn area.

**5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document sufficiently analyze site-specific impacts related to the current proposed action?**

Yes – Impacts from the continued use of prescribed fire to enhance & restore the native wetland prairie would remain the same. The prescribed burning would occur within the same location as the previous analyzed in the EA-93-31/EA-95-27 for the same purpose.

**6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)?**

Yes – soil disturbance treatments of the Proposed Action are not proposed for implementation in the fall 2004. No cumulative impacts (beyond those already described in the RMP and EA-93-31/EA-95-27) are anticipated from the implementation of prescribed fire on the 6 acres at the Long Tom site.

**7. Are the public involvement and interagency review associated with existing NEPA document(s) adequately for the current proposed action?**

Yes, Availability of the EA and the project decision was advertised in the Eugene Register Guard, sent to interested persons on our EA mailing lists and coordinated with The Nature Conservancy, Ed Alverson and consulted with the USFW Service in 2004.

**E. Interdisciplinary Analysis:** Identify those team members conducting or participating in the preparation of this worksheet.

<u>Name</u>	<u>Title</u>
Sally Villegas	Wildlife Biologist
Dharmika Henshel	Botanist
Nancy Ashlock	Fire Management Officer
Rick Colvin	Landscape Planner

---

### CONCLUSION

☒ Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the existing NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked

/s/ Steven Calish  
Signature of the Responsible Official

7/29/2004  
Date

### **Finding of No Significant Impact/Decision Record**

I have reviewed this Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA) (OR090-DNA- 04-03) and have determined that the proposed action is in conformance with the approved land use plan (Eugene Record of Decision and Resource Management Plan, June 1995, as amended) and that no further environmental analysis is required.

On the basis of the information contained in the DNA Worksheet and the existing NEPA documents it references, and all other information available to me, it is my determination that implementation of the proposed action will not have significant environmental impacts beyond those already addressed in the environmental analysis (EA-93-31 & EA-95-27).

The BLM has made the determination that continued use of prescribed fire is required to help control shrubs and trees as well as enhance the reproductive status of Bradshaw's lomatium. Therefore, it is my decision to implement the project, as described, in the DNA Worksheet.

Authorized Official: /s/ Steven Calish  
Steve Calish, Field Manager, Siuslaw Resource Area

Date: 7/29/2004